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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

April 8, 2003

Mr. Keith Klein
United States Department of Energy
P. O. Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. Keith Thomson
Fluor Hanford Incorporated
P.O. Box 1000, MSIN: H5-20
Richland, Washington 99352

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EDMC

Dear Messrs. Klein and Thomson:

Re: Inspection of Waste Analysis Plan at Low Level Burial Grounds

Thank you for the assistance of the United States Department of Energy (USDOE) and Fluor Hanford Incorporated (FH) personnel during the Washington State Department of Ecology's (Ecology) January - February inspection into the Waste Analysis Plan (WAP) in use at Hanford's Low Level Burial Grounds (LLBG).

Ecology's inspection revealed no violations and found the WAP improved over previous revisions; however, concerns were revealed regarding implementation of the WAP. Completion of the permitting process may reveal some need for revisions to the WAP, but the concerns listed below should be addressed immediately.

CONCERNS:

- 1) Despite recordkeeping requirements specified within the LLBG waste analysis plan, no documentation was maintained by Richland Operations Office (RL), FH, or Pacific Northwest National Laboratory (PNNL) to record how the discrepancy between container ID number and shipping papers was resolved for PNNL drum # 005109 shipped to the LLBG in May 2002. Failure to document how such non-conformance issues are resolved appears to violate LLBG waste analysis plan requirements. Also, such lapses in recordkeeping represent poor business practices which fail to ensure similar non-conformance issues do not reoccur in the future.



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- 2) A second anomaly occurred with drum # 005109, received at LLBG in May, subsequent to issuance of a new ID number for the drum to resolve the discrepancy between shipping papers and drum numbering. Subsequent to issuance of the new drum number, container #005109 was subjected to non-destructive visual examination (NDE) in the Waste Receiving and Processing Facility. This NDE revealed that the drum's contents were different than described in the inventory supplied with the drum. Although the contents were within the general description for the overall waste stream expected (debris type waste), this container of waste had just experienced a non-conformance issue regarding the difference in drum number between the container and the shipping papers for it. Concurrent with these anomalies, PNNL was undergoing a significant reorganization of its waste management process due to previous failures to accurately identify its waste streams and specifically, to segregate mixed waste constituents from non-mixed waste constituents. Ecology is concerned that this second event in conjunction with the first, and in consideration of PNNL's waste management problems, was not recognized by FH as a pattern of problems with this container in particular, or the waste stream in general.
- 3) Although Ecology understands PNNL is recovering from a process upset within its waste management group, the lack of documentation from which to designate drum #005109 (shipped to LLBG in May) is troubling. Ecology strongly recommends that PNNL's recovery plans include clear direction for maintaining waste designation records. PNNL drum #005109 was shipped in May 2002, as Transuranic (TRU) non-mixed waste. A second drum with the same identification number was discovered in January 2003; however designation of the drum shipped in May was not completed until March 2003. The drum shipped in May has now been re-designated as low level mixed waste.

Should you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson
Compliance Specialist
Nuclear Waste Program

BW:nc

cc: Ellen Mattlin, USDOE
Fred Ruck, FH
Todd Martin, HAB
Rick Gay, CTUIR

Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, OOE
Administrative Record